

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MARCIA SCOTT AND ISRAEL	)	
SCOTT (for themselves and as a	)	
representative of their minor child),	)	
	)	
Plaintiffs,	)	
	)	Civil Action File No.
vs.	)	1:19-CV-04330-LMM
	)	
SAFECO INSURANCE COMPANY OF	)	
INDIANA, A LIBERTY MUTUAL	)	
COMPANY, AND SHILAN PARHAM	)	
	)	
Defendants.	)	

**DEFENDANT SHILAN PARHAM'S ANSWER TO PLAINTIFFS' FIRST  
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL [Doc. 87]**

Defendant Shilan Parham, by and through counsel of record, files this her Answer to Plaintiffs' First Amended Complaint [Doc. 87] and shows as follows:

**FIRST DEFENSE**

Plaintiffs' First Amended Complaint is barred, in whole or in substantial part, based upon the Court's June 24, 2020 Order [Doc. 82] dismissing all claims brought by plaintiffs Marcia and Israel Scott's against Shilan Parham, including their claims for medical expenses on behalf of their minor child.

**SECOND DEFENSE**

Responding to the specific allegations of the numbered paragraphs of

plaintiffs' Complaint, defendant responds as follows:

1.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

2.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

3.

Defendant admits the allegations contained within this paragraph of plaintiff's Complaint.

4.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

5.

Defendant admits the allegations contained within this paragraph of plaintiff's Complaint.

6.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

7.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

8.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

9.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

10.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

11.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

12.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

13.

Defendant is without knowledge sufficient to admit or deny the allegations contained within this paragraph of plaintiff's Complaint.

14.

Defendant adopts, and incorporates by reference, all preceding paragraphs.

15.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

16.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

17.

Defendant denies the allegations contained within this paragraph of plaintiff's Complaint.

18.

Defendant admits to a breach of the applicable standard of care. Defendant denies the remaining allegations contained within this paragraph of plaintiff's Complaint.

Any allegation, language or paragraph of plaintiffs' Complaint not heretofore responded to is specifically denied by defendant Shilan Parham.

WHEREFORE, having fully answered plaintiffs' Complaint, defendant prays:

- a) that plaintiffs' Complaint be dismissed;

- b) that defendant have judgment in her favor;
- c) that defendant have a trial by jury of twelve persons; and
- d) that defendant have all other proper relief.

This 29<sup>th</sup> day of July, 2020.

/s/ Matthew Hurst  
Marcia S. Freeman  
Georgia Bar No. 430923  
Matthew J. Hurst  
Georgia Bar No. 480267  
Attorneys for Defendant  
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**CERTIFICATE OF COMPLIANCE**

The undersigned hereby certifies that the foregoing document complies with the font and point selections approved by the Court in Local Rule 5.1C. The foregoing document has been prepared in Times New Roman font, 14 point.

/s/ Matthew Hurst  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2020, I electronically filed the forgoing

**DEFENDANT SHILAN PARHAM'S ANSWER TO PLAINTIFFS' FIRST  
AMENDED COMPLAINT AND DEMAND FOR JURY TRIAL [Doc. 87]**

using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney(s) of record:

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This 29th day of July, 2020.

/s/ Matthew Hurst  
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Georgia Bar No. 430923  
Matthew J. Hurst  
Georgia Bar No. 480267  
Attorneys for Defendant  
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